

Jeremy Johnson



Bob Holden, Governor • Stephen M. Mahfood, Director

DEPARTMENT OF NATURAL RESOURCES

www.dnr.mo.gov

November 23, 2004

CERTIFIED MAIL – 7002 0860 0007 6968 1305
RETURN RECEIPT REQUESTED

Mr. Joseph Haake
Group Manager
The Boeing Company
Dept. 464C, Bldg. 220
Mail Code S221-1400
P.O. Box 516
St. Louis, MO 63166-0516

RE: Boeing Resource Conservation and Recovery Act Facility Investigation (RFI) Report
Hazelwood, Missouri, Permit # MOD00818963

Dear Mr. Haake:

The Missouri Department of Natural Resources' Hazardous Waste Program (HWP) has reviewed the May 6, 2004, response to the HWP's comments on the RFI report dated October 22, 2003. The HWP hereby accepts the changes to the RFI report with the following comments that need to be addressed during the Risk Assessment and/or Corrective Measures Study (CMS) phases of this project.

General Comment:

In several instances in the HWP's comment letter dated April 6, 2004, the HWP points out that there are still several areas where the extent of contamination is not defined to the Investigative Threshold Levels (ITLs) specified in the RFI Work Plan. However, the HWP does agree with Boeing's response that for the purposes of the RFI the sources are adequately defined. To reiterate previous discussions between the HWP and Boeing, it needs to be understood that following development of site-specific clean-up levels for the site, additional contaminant delineation may be necessary in some areas as part of the CMS.

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RCRA RECORDS

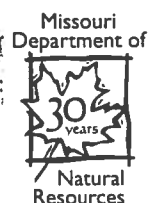
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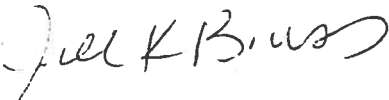
Specific Comment:

Comment Number 10 – Section 2.9 Surface Water Creek, page 2-6, 17. The HWP's comment on this section was directed to the fact that site-specific factors imply that shallow groundwater does discharge into Coldwater Creek. By comparing water elevations in nearby shallow wells (508-513 feet amsl) with the lowest elevation of the creek (505 feet amsl) it appears that groundwater would discharge to some extent into the creek. The HWP's comments also addressed the limitations of the U.S. Geological Survey study, which stated that no measurable quantity of diffuse groundwater inflow could be detected along Coldwater Creek. While the response given addressed the limitations, and explained that no measurable impacts to the creek have been attributed to the Boeing site, there are still no conclusions as to whether Coldwater Creek could be receiving small amounts of contaminated groundwater, at least during certain flow regimes. Even though, to date, there is no direct physical evidence or measurable chemical impacts in Coldwater Creek that are directly attributable to the Boeing site, the surface water pathway should not be considered incomplete in the Risk Assessment. For this pathway to be excluded, more definitive evidence is needed which shows that Coldwater Creek does not receive contaminated groundwater from Boeing's releases at or in the vicinity of the site. Lacking such evidence, this pathway should be carried forward for evaluation in the Risk Assessment.

Please finalize and send out copies of the final RFI Report in accordance with the applicable permit requirements. We would appreciate submission of the final RFI Report within 30 days of receipt of this letter. Once we have received the final RFI Report and have verified that all appropriate changes have been incorporated therein, we intend to issue a final RFI approval letter to Boeing. If you have any questions concerning this comment letter or require any additional information, please do not hesitate to contact me at the Missouri Department of Natural Resources, HWP, P.O. Box 176, Jefferson City, MO 65102-0176, or by phone at (573) 751-3553.

Sincerely,

HAZARDOUS WASTE PROGRAM



Jill K. Bruss
Environmental Engineer
Permits Section

JKB:mj

c: Ms. Joletta Golik, Airport Authority
Mr. Jeremy Johnson, United States Environmental Protection Agency Region VII
St. Louis Regional Office